

**[ORAL ARGUMENT EN BANC SCHEDULED FOR SEPTEMBER 30, 2021]****IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

ABDULSALAM ALI  
ABDULRAHMAN AL-HELA

*Appellant,*

*v.*

JOSEPH R. BIDEN, JR., *et al.*,

*Appellees.*

**No. 19-5079**

**RESPONSE OF PETITIONER-APPELLANT TO THE MOTION FOR  
LEAVE TO PARTICIPATE IN ORAL ARGUMENT**

Petitioner-Appellant Abdulsalam Ali Abdulrahman Al-Hela files this response to state his position on the motion of *amicus* Khalid Ahmed Qassim for leave to participate in oral argument. Mr. Al-Hela takes no position on the motion, except that he opposes the motion to the extent that any time allocated to the movant would be subtracted from the time otherwise available to Mr. Al-Hela.

For the avoidance of doubt, and in response to the movant’s statement that the question of whether Due Process applies “should be contested by an advocate at the en banc oral argument” (Motion at 4-5), counsel for Mr. Al-Hela intends to contest that question.

Respectfully submitted,

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September 10, 2021

*Attorneys for Petitioner-Appellant*

**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing response complies with the type-volume limitation of Fed. R. App. P. 27(d)(2) because it contains 119 words.

/s/ Andrew D. Garrahan  
Andrew D. Garrahan

**CERTIFICATE OF SERVICE**

I certify that on this 10th day of September, 2021, I caused to be filed the foregoing petition for rehearing en banc with the Court via the appellate CM/ECF system of the United States Court of Appeals for the District of Columbia Circuit.

I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

/s/ Andrew D. Garrahan  
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